

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMERICAN BROADCASTING
COMPANIES, INC., DISNEY
ENTERPRISES, INC., TWENTIETH
CENTURY FOX FILM CORPORATION,
CBS BROADCASTING INC., CBS STUDIOS
INC., FOX TELEVISION STATIONS, LLC,
FOX BROADCASTING COMPANY, LLC,
NBCUNIVERSAL MEDIA, LLC,
UNIVERSAL TELEVISION LLC, and OPEN
4 BUSINESS PRODUCTIONS, LLC,

Plaintiffs,

v.

DAVID R. GOODFRIEND and SPORTS
FANS COALITION NY, INC.,

Defendants.

No. 19-cv-7136 (LLS)

**FIFTH JOINT STIPULATION AND [PROPOSED] ORDER
MODIFYING CASE SCHEDULING ORDER**

Plaintiffs American Broadcasting Companies, Inc., Disney Enterprises, Inc., Twentieth Century Fox Film Corporation, CBS Broadcasting Inc., CBS Studios Inc., Fox Television Stations, LLC, Fox Broadcasting Company, LLC, NBCUniversal Media, LLC, Universal Television LLC, and Open 4 Business Productions, LLC (“Plaintiffs”), and Defendants David R. Goodfriend and Sports Fans Coalition NY, Inc. (“Defendants”), by and through their counsel, respectfully submit this Fifth Joint Stipulation and Proposed Order Modifying the Scheduling Order in the above-captioned matter.

On January 31, 2020, this Court entered an initial Scheduling Order with deadlines set through the close of expert discovery on September 11, 2020. At the parties’ joint request, this Court on May 12, 2020 entered an Order modifying the case schedule by extending the existing

deadlines by eight weeks. On July 6, 2020, September 3, 2020, and November 13, 2020, the Court entered additional Orders modifying the case schedule by extending the existing deadlines by approximately eight weeks each time.

As discussed with the Court during the status conference on January 15, 2021, the parties respectfully request that the Court enter the parties' agreed-upon modifications to the expert discovery schedule below, as well as the additional deadlines for summary judgment, Daubert motions, and the pretrial order, as well as the trial-ready date. This is the fifth time the parties have sought an extension or modification to the case schedule.

IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, that the following deadlines are extended pursuant to the table below:

Event	Current Deadline	New Deadline
Burden-of-proof expert reports	Friday, January 22, 2021	Thursday, February 18, 2021
Rebuttal expert reports	Friday, February 19, 2021	Thursday, March 18, 2021
Expert discovery completed	Friday, March 19, 2021	Thursday, April 8, 2021
Opening summary judgment briefs	N/A	Thursday, April 29, 2021
Summary judgment oppositions	N/A	Thursday, May 27, 2021
Summary judgment replies	N/A	Thursday, June 10, 2021
Motions objecting to the reliability of an expert's proposed testimony under Rule 702 of the Federal Rules of Evidence	N/A	Thursday, June 17, 2021
Oppositions to motions objecting to the reliability of such experts' proposed testimony under Rule 702 of the Federal Rules of Evidence	N/A	Thursday, July 8, 2021

Replies in support of motions objecting to the reliability of such experts' proposed testimony under Rule 702 of the Federal Rules of Evidence	N/A	Thursday, July 22, 2021
Plaintiffs will initiate the pretrial order materials process to Defendants pursuant to the Court's Individual Practices	N/A	Thursday, June 17, 2021
Parties' submission of a pre-trial order in a form conforming with the Court's instructions together with trial briefs and either (1) proposed findings of fact and conclusions of law for a non-jury-trial; or (2) proposed voir dire questions and proposed jury instructions for a jury trial	N/A	Thursday, August 19, 2021
Trial-Ready	N/A	Thursday, September 16, 2021

